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Insurance Continuing Education Advisory Council

Minutes

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September 8, 1993

The following are summary minutes of the Insurance Continuing Education Advisory Council.

The meeting of the Insurance Continuing Education Advisory Council was called to order in the Director's Conference Room, Lee Metcalf Building (DNRC) at 1:00 p.m.

Members Present

Mark Nelson, Insurance Department Non-Voting Member
Ted Clark, Public Member
John Bebee, Unaffiliated Insurance Agent Member
Steve Bahls, Public Member
Tony Leenknecht, Montana Association of Life Underwriters Member
Bill Bolt, Professional Insurance Agents of Montana Member
Robin Boon, Independent Insurance Agents of Montana Member

Staff Present

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Mark O'Keefe, Insurance Commissioner
Frank Coté, Deputy Insurance Commissioner
Sheila Kessler, Licensing Program Assistant
Tammy Peterson, Recording Secretary
David Gallik, Insurance Attorney
Mary Arnold, Continuing Education Program Coordinator
Geoffrey Brazier, Attorney

A list of other parties present is attached as Exhibit 1.

Each member provided a brief introduction.

Mark Nelson is the Administrator of the Licensing Division of the Insurance Department. Nelson is the non-voting member of the council representing the Insurance Department.

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Ted Clark is a teacher from Billings, Montana and has taught for several decades.

John Bebee works for D. A. Davidson Trust Corporation. He was the Deputy Insurance Commissioner about 5 years ago and has experience in regulation.

Steve Bahls is a professor of the University of Montana, School of Law. He teaches Business Law, Principal and Agency, and Agricultural Law.

Tony Leenknecht is representing the State Life Underwriters Association.

Bill Bolt works for the Flynn Insurance Agency. He has been in the insurance industry since 1979. He is the president of the Professional Insurance Agents Association of Montana.

Robin Boon is the Executive Director of Flathead Association of Independent Agents. She entered into the insurance business in 1985. Ms. Boon represents the Independent Insurance Agents of Montana on the advisory council.

Nelson introduced state Insurance Commissioner, Mark O'Keefe.

Commissioner O'Keefe thanked the members for agreeing to do this job. He told the members he realized the imposition it makes on their lives and jobs. O'Keefe said continuing education will have important effects on insurance providers in the state. O'Keefe set these goals for the Council:

1. Create administrative rules for the Insurance Continuing Education program.

2. Develop administrative rules for written certification of course attendance and fees submissions and reporting requirements.

3. Create certification standards for course instructors.

4. Participate in the public rule making process.

5. Review course materials from course providers for certification and make recommendations to the Commissioner.

6. Promote continuing education in the groups they represent. Explain to people how the program works and why it is important.

O'Keefe stated the good people in the insurance industry are very well qualified and spend a lot of time and energy providing good service in Montana. This program can encourage professional agents to excel in the career that they've chosen. O'Keefe stated he would be glad to answer any questions from the Council members.

Nelson introduced the staff of the Insurance Department who were present.

Nelson stated that Department staff members are a resource for the council to use. Public comment will be directed to the advisory council by staff. The council may request anything they need from staff.

Overview of Senate Bill 354 - Panel Discussion

Mr. Coté facilitated a panel discussion to provide an overview of Senate Bill 354. Panel members were Roger McGlenn, Executive Director, Independent Insurance Agents of Montana; Larry Akey, lobbyist, Montana Association of Life Underwriters; and Debbie Berney, Executive Director, Professional Insurance Agents Association of Montana.

Coté introduced the panel members and the topic they would cover.

McGlenn presented the history of continuing education efforts in Montana. In 1978 - 1979 continuing education was first seriously discussed in Montana. A bill was drafted in 1978-79 by the Montana Insurance Education Foundation. Commissioner Omholt

requested the bill not be introduced. This request was based on the administrative burdens other states experienced when implementing continuing education programs.

In 1987, the Montana Association of Life Underwriters introduced a continuing education bill. The bill passed the Senate without objection, but died in the House. During that process, the Montana Association of Life Underwriters and the Independent Insurance Agents of Montana promised the members of the House Business and Industry Committee to study Continuing education issues and return during the 1989 session with recommendations on the issues.

An insurance industry task force was formed in 1987. A three point program was developed and pursued. The first two points were to clarify Montana statute on who must be licensed and when they must be licensed. Commissioner Bennett interpreted the law broadly on who should be licensed. Based on this interpretation of the law, during the mid-1980's, substantial numbers of people were licensed by insurance agencies.

In 1989, single-licensing and licensing requirements were addressed in legislation. Legislators were encouraged to kill the pre-licensing bill if the clarification of who must be licensed failed. Both bills passed.

The third point was to continue development of a responsible continuing education bill for the Insurance Department to introduce to the legislature. In 1992, the industry association task force began developing a draft continuing education program bill. The task force studied other states for success and failures. (All but 10-12 states have continuing education requirements.) The task force took into consideration the difference between agent needs and the model language proposed by the National Association of Insurance Commissioners. Consumer benefits were a priority and minimizing bureaucratic and financial burdens on the Montana licensed agent was a priority.

Senate Bill 354 was a compilation of these priorities and information, and the Insurance Departments goals and objectives. Senate Bill 354 was supported by all the producer associations. Two amendments were made as the bill went through the legislature. First, fees are to be established commensurate with the costs of the program. If the fees went through the appropriations process they could be lost to the fiscal crisis in the state, continuing education without adequate staff or funding could become law. The second amendment stated that sellers of only credit life and disability insurance who receive revenue from sale of credit life "incidental" to other noninsurance activities are exempt from continuing education requirements. This amendment was resisted by the agents associations and by the Insurance Department.

Akey discussed the effects of the law on insurance producers and consultants. The goal of the Continuing education bill is to improve the competence of working insurance professionals in Montana to protect the Montana insurance consumer. Improving the competence of the insurance producer is critical in protecting the insurance consumer. Senate Bill 354 formalized what most agents already do. The council and the commissioner should remain flexible in development of rules and enforcement of Senate Bill 354.

There are four areas of concern: the geographic dispersal of insurance professionals in this state, the ability to approve correspondence, self-study and tele-conferences should be built into administrative rules; flexibility in course content, insurance education can encompass the area of agency management, sales techniques and financial statement analysis and such courses ought to be considered for course certification; courses that are specific to the internal procedures of a particular company should not be continuing education courses; and the importance of courses on the sale of products.

Remain flexible with multi-line agents. Develop a guideline for multi-line licensees to get education in each line, but not be rigid regarding exact course numbers year-to-year.

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Be flexible and timely in the approval process. Approve courses late this year and early next year so producers don't have to take their credits all at once. Getting the Continuing education courses on-line quickly will benefit the consumer. Two other areas he mentioned are reciprocity with other states and fees. Each state has different requirements, if other states recognize Montana's continuing education requirements, Montana should recognize those of the other state. The Montana program should be designed to ensure other states will accept our certification. Agents believe in legitimate fees to make the program work. They do not want fees to become a burden to the providers. Keep fees reasonable.

Berney discussed the effects the Senate Bill 354 will have on education providers. The issues of importance are the set-up costs of course providers and course provider certification. Potential providers may be in-state associations, in-state companies and other in-state educators. There will be self-study programs, video courses, audio courses and training manuals that the members will have to review. National Certification programs, companies, colleges and universities may want to offer courses.

Berney said the Professional Insurance Agents Association is concerned about the continuing education program being funded. Berney said the council should look at the fee structure in other states. Continuing education courses that provide useful materials and topics need to be available in remote areas.

Berney said questions the administrative rules should answer are: how will course revisions and convention programs be handled in the fees schedule and will instructors get continuing education credit for hours they teach? The Professional Insurance Agents Association is worried about clarity in the course approval time frame.

Akey said that during a meeting with the Commissioner prior to the legislative session it was the position of the Association of Life Underwriters, and of the two other associations, that anyone offering insurance in the state of Montana should meet the

requirements set in Senate Bill 354. The field of insurance is changing rapidly enough that if someone has a license to sell, it needs to be kept current. One of the areas he feels the council ought to look at is what is appropriate for Title Insurance Agents. The council should take a look at Senate Bill 354 and make changes in the 1995 legislature. His association also feels if a person is covered by the insurance code in the licensure, that person should be subject to some continuing education requirements. That is why the Life Underwriters resisted the efforts to exempt the sellers of credit life and credit disability insurance.

Jack Johns, Montana Land Title Association said the title insurance association will voluntarily send suggestions on continuing education for title agents to the advisory council. Title agents are not in the same category as other insurance people. Their business is more closely related to the real estate.

McGlenn said the Independent Agents Association concern is once exemptions begin, where do they stop?

Frank Coté asked if there were any other questions from the advisory council. Coté summarized the panel comments. The goal of Senate Bill 354 is to benefit the consumer. There are many different licenses out there and the panel needs to be flexible in the way they look at how each person in an agency operates. Also the state geographic boundaries create difficulties. The Commissioner's Office made a commitment to the legislature that they would approve correspondence courses. All three of the panel members mentioned fees. The agents and the providers all are concerned about fee levels. Coté said he was confident that this committee will devise a good plan.

<u>Overview of Insurance Continuing Education Nationwide</u>

Nelson gave an overview of both insurance continuing education and Montana licensees. There is no particular continuing education standard in the United States. He stated that the Mid-West Zone of National Association of Insurance Commissioners

at one point proposed single agent licensing throughout the U.S. A multi-state licensing and continuing education package was also proposed. Nelson said there are 45 out of 50 states that have continuing education. The number of required hours of continuing education varies in each state. Nelson reviewed the continuing education *Requirements Quick Guide* for the council (Exhibit 2). A licensee proves course attendance by sending in a certificate, the course provider sending in a certificate, or both sending it in. Nelson talked about reciprocity. Most states require non-residents to meet the requirement or that of their home state. Many states waive continuing education requirements if a state has equivalent requirements.

Course provider fees range from nothing to $500.00. Agent fees range from $0 to $25.00. The fiscal note for Senate Bill 354 states $150.00 per course and $25.00 per agent. Nelson let the council know it will be up to them to decide where those fees are going to fall. Nelson went over the survey sent to potential course providers (Exhibit 3). Surrounding states were asked for a list of continuing education providers. Of 300 surveys sent to course providers 46 have been returned. The responses suggest 357 courses may be offered in Montana.

Clark asked if there is a statutory requirement for completion of a certain number of credit hours.

Akey responded the requirement is 10 credit hours per year for single line licensing and 15 credit hours per year for multi line licensing.

Bahls asked if the Mid-West Zone Insurance Commissioners is a formal organization or only in the discussion phase.

Nelson replied that it is a formal organization. They started a licensing initiative to get uniformity. They want to form a clearing house of continuing education providers. Each state would retain authority to approve courses, but the clearing house would recommend how many credit hours a course is worth.

Insurance Licensees in Montana

Nelson talked about the various insurance licenses in Montana: Life and health, property/casualty and surety, agencies, title agents and agencies, credit life and crop hail. Montana has 14,000 licensees, split equally between resident and non-resident; 3,767 individual life and disability producers, 1,509 resident and 2,258 non-resident; 1,843 individual property and casualty producers, 650 resident and 1,193 non-resident; 463 life and health agencies, split equally between resident and non-resident; 858 property and casualty agencies, 244 resident and 614 non-resident; 671 agencies that are multi-line, 4,800 individuals with multi-line licenses, 4,138 resident and 741 non-resident; 50 consultants, 39 resident and 11 non-resident; and 84 surplus lines agents. The 500 adjusters are not covered by the continuing education bill, are all resident. There are 401 credit life only license holders, 85 residents and 16 non-residents. The number of licenses issued each month in Montana is 250.

Tony Leenknecht asked Nelson if a broker licensed with 5 or 6 different companies has what is considered an individual license.

Nelson said those are considered company appointments. He said the Licensing Bureau processes almost 14,000 appointments a year. A person may hold as many appointments as a company wants to give them. Nelson stated that these are active licenses. In the past if one didn't have an appointment for 90 days, that license was pulled. Now a license is perpetual. He expects the number of license holders to decrease once the continuing education program gets going.

Leenknecht asked if a person leaves a business can they still maintain a license?

Nelson said yes.

McGlenn asked if one holds three different licenses would that person be counted three times. Nelson said that it could show up that way.

Clark asked if McGlenn had to renew his license every year. McGlenn said yes. Clark asked if license renewal would depend on the number of classes he took and passed. McGlenn said yes, he would have to complete the number of courses required in the statute.

Nelson introduced Geoff Brazier, administrative rules attorney for the department, to talk about the Administrative Rules process.

Administrative Rule Making Process

Brazier gave a history of rules then explained the procedure the council must follow. The legislative body or the regulatory agency establishes some standards of conduct and also makes some attempt to maintain knowledge and ability through the rules. In insurance regulation the state Auditor is bound by the *Administrative Procedures Act*.

Rule making procedure requires various actions from an agency. There are two notices issued as a result of deliberation by the council; the notice of intent to adopt rules and the notice of adoption of administrative rules. Both notices are published in the Montana Administrative Register. Notice must be sent to individuals on a list of interested parties. There is a process for public input that includes a public hearing and an opportunity to submit written comments. After this process, a final notice is published. The council develops the rules prior to the notice.

Two other agencies become involved in these procedures: the Secretary of State's office compiles and publishes the rules; the legislative code committee oversees all rules making. Rules go into effect the date after the notice of adoption is published in the Montana Administrative Register.

The council may follow the National Association of Insurance Commissioners model rules, those of other Montana regulatory boards that have continuing education or rules from other states. Brazier reviewed the *Synopsis of Rule Making Procedure* handout.

Brazier will prepare a notice of rule making for the rules that are required by recent legislation. He suggested including the fees rules.

Nelson asked the council if they had any questions of Brazier.

Bolt asked Brazier the question if the fee structure for the continuing education for insurance agents was already in place.

Brazier explained that the fee structure is not in place. He explained the filing dates for publication.

Public Comment Period

Nelson next opened the meeting up for public comment.

Jerry Furniss, Connole-Morton and a professor at the University of Montana, made comments. He said courses should be structured in a broad way for course content. He recommends development of low minimum course area requirements. Require four of 15 credit hours in Life and Health, four of 15 credit hours in Property and Casualty and the remaining credits would be open. Not all continuing education will fit in specific categories. He stated other state continuing education course programs limit the number of insurance company-sponsored credits. Some states limit those credits to 50% of the annual requirement. Pre-licensing courses should not be part of continuing education requirements. The following classes are not appropriate to fill continuing education requirements: community service, motivational classes, securities training, communication skills, association meetings and economic outlook seminars. He suggested setting credit hours in whole hours. Set one credit hour for every three university credits. There should be testing requirements in the self-study courses. He recommends credit life definitions and rules be very specific.

Dave Jones, Agency Training Coordinator, State Farm Insurance Companies said the fee structure is heading in the right direction. If a person is teaching more than one hour, the fee scale goes accordingly. Courses with non-monitored exams may

have too much abuse, but there should be some type of testing. Learning the product will benefit the consumer. He suggested certifying course providers.

Jones asked Nelson to clarify the fee on providers. Nelson told Jones that the fiscal note states $150.00 per course and $25.00 annual filing fee for licensees.

Bolt asked Jones about limitations on the number of hours for company correspondence courses. Jones responded that they should not be limited. As long as a person is taking courses on the products they sell, that is enough. The products of insurance companies don't really differ much.

Jerry Furniss suggested the council check the Wyoming limitations on company courses.

Jones said the State Farm homeowner class talks about exclusions. There is nothing in the policy that singles it out.

Kendra Kawaguchi, lobbyist for the Montana Land Title Association and the National Association of Independent Insurers, asked the council to keep the title industry in mind.

Bolt asked about title insurance continuing education courses. He heard from title insurance agents that there are not enough title courses available.

Furniss replied that in real estate continuing education there is a potential source of courses.

Bolt asked Furniss if there are 10 hours of real estate courses that are applicable to title insurance agents. Furniss said yes. Jack Johns stated that the American Land Title Association has a correspondence course that they provide for title insurance agents and Colorado offers a continuing education course for title insurance agents.

Nelson said he spoke to the American Land Title Insurance Association, their concern was that courses, which were not

strictly insurance, would not be accepted for continuing education credit.

Review and Adopt Advisory Council Work Plan

Nelson had Arnold review the draft advisory council work plan. She identified the issues that drove the work plan: statutory requirements, the administrative rules time table (Exhibit 4) and the proposed meeting schedule (Exhibit 5). The administrative rules timetable is designed to have rules in place by the end of December so course may be offered throughout 1994. She said the development of draft administrative rules material can be done by staff. Many of the National Association of Insurance Commissioners proposed rules are included in the Montana statute, therefore additional administrative rules are not needed.

Two issues that need to be covered in administrative rules are: fees and program implementation rules. The fiscal note for Senate Bill 354 identifies several fee levels. The projection was that 200 continuing education courses would be proposed for certification during the first year at a fee level of $150.00 per course. That $150.00 fee covers certification of approved courses for two years. Providers of courses that are not approved lose their fee. Fees are non-refundable according to the fiscal note. The fiscal note also states that there is a $50.00 renewal fee every biennium.

The second set of fees is for agents. The proposed fee level for agents is $25 a year. At this time Montana agents have a perpetual license. There is no renewal fee. Agents living outside the state pay a $10.00 renewal fee. According to the law, the fees that are generated must pay for the implementation and the operation of the continuing education program, the personnel involved, office expenses, the offering and reviewing of courses, and the advisory council meeting expenses.

Bebee asked if the Auditor's Office agreed with the fiscal note. Arnold replied yes.

Arnold stated that anything affiliated with offering continuing education is part of this budget. Bebee asked about the 1.75 F.T.E. position. Arnold said the continuing education program position and a support position are in that figure. The other position will be filled by January.

Arnold explained an additional fee issue. In order for fees to be generated and put back into our funding base that fee must be defined in administrative rules. A course on changes in Montana insurance statute and administrative rules will cost slightly over $10.00. A fee of $10.00 to cover the costs of that course should be included in the Administrative rules.

O'Keefe told the council that it doesn't have to be the Commissioner's Office that gives this course. The department just wants to ensure the course is provided by someone.

A discussion of the exact numbers of people licensed and the figures listed on the fiscal note took place.

Arnold told the committee members that to meet the deadlines for the Administrative Rules, draft administrative rules must be noticed by October 18th. A draft notice indicates that the council and an agency have intent to produce a set of administrative rules. The rule making process includes a public hearing. The earliest this hearing can be held is November 29. A quorum of this advisory council should be present to listen to the public comment of interested parties. Written comment on the rules will be due November 30. Each comment requires a written response. Throughout this process the draft rules can be revised by this body, public comment, or by written comment.

Arnold next discussed the meeting dates for the council members. The final dates for meetings were discussed along with the proposed work plan (Exhibit 6). Arnold explained the activities for each meeting.

The question was raised if the staff will have some summarization of the activities listed in the work plan. Arnold said they will do that.

Clark asked if the staff will identify the areas of controversy and the areas on which the Council should pass judgment. Arnold said yes.

Akey asked if we were going to accept the American College courses. Arnold told him the content of the courses would not have to be looked at, but they would have to be filed and the fees paid. O'Keefe said that the committee has to consider what portion of the $150.00 fee goes toward course review. There was a discussion regarding a fee cap for course providers.

Arnold said that the program should not collect any excess revenue. However, if the fees are reduced and less revenue is generated than the fiscal note projection the legislature would not allow the program to cover its costs through general funds.

Jerry Furniss asked if a course is offered in six locations is that considered one course or six courses? He also asked if a 10 credit hour course would be charged the same review fee as a 15 credit hour course.

Nelson said those are issues that the council will be considering.

O'Keefe said the less providers were charged the larger the charge for licensing. One way or the other the fee will be going back on the producers.

With staff recommendation, summary and a break out of areas of concern for discussion the committee members agreed they could accomplish what was needed for the November meeting. Arnold noted that the meeting on the November 29 will be a half a day meeting, starting at 1:00. Arnold asked Mr. Clark if he wants to see an analysis of the courses. Clark answered that he would like to see a synopsis of each course. If there is no controversy, he would like the staff to prepare a summary of the course. Arnold asked Mr. Clark if he wanted to see a proposed a number of credit hours attached with the staff's recommendations on each course. All members agreed that they would like that.

McGlenn said other states view of a course would be helpful for the council. Nelson stated that should be part of the analysis.

Arnold stated that the rules will be finalized on December 24. A review of the specific meeting dates was discussed; October 6, November 3, public hearing the afternoon of November 29, December 10, no meeting projected for January, a meeting in February has been proposed, no meeting in March, a meeting in April, none in May and a meeting in June. Arnold asked if there were any other items the members wanted added to the work plan.

Nelson suggested they approve the work plan as revised. The committee approved the work plan.

Discussion of Draft Administrative Rule Elements

Arnold reviewed the elements of the draft continuing education administrative rules.

1. The law provides for reciprocal agreement with other states. The rules need to provide a mechanism to implement them. The law provides that Montana residents who hold Montana insurance licenses must meet Montana's continuing education requirements as opposed to meeting out-of-state continuing education requirements.

2. Under fees, the producer fee of $25.00 annually with license renewal is straight forward, based on the fiscal note.

3. The Auditor's Office staff may attend or audit courses certified by the continuing education program on a no-fee basis. This provides a mechanism to monitor courses without receiving permission from the course provider.

4. The proposed non-refundable certification fee is $150.00 per course. This fee covers the course review and if the course is approved, certify it for two years. That fee is based on the fiscal note.

Clark asked if someone submits a course to be reviewed and the committee says that some parts are good and some not, do the providers have the option to go back and qualify without losing their fee?

Arnold said that having some sort of redress for providers should their course not be approved should be discussed.

5. The proposed $10.00 fee for the Montana Insurance Department offering of a course on changes in Montana insurance statutes and administrative rules to cover the cost of material printing and mailing.

Jerry Furniss suggested they consider the repeatability of courses as well.

6. Items that need to be included on course approval submission: the name of the sponsoring organization; the title of the course; the proposed date of offering; course objective; major course topic; course length; other states that have adopted the course; the type of course; teaching method; evaluation method; attendance verification; method of record maintenance; instructor information and a contact person.

Steve Bahls asked Arnold if complete course materials will be requested for each course. Arnold replied that in most cases one doesn't ask for the entire copy of course materials. She stated that the full materials for a course, if necessary, may be requested.

Clark asked Jerry Furniss if students pay him a fee when he conducts his classes and if he provides handouts.

Jerry answered that he supplies an outline of the topics covered and the students can take notes right on the materials.

Arnold said that the advisory council can require the entire volume of course materials be submitted before a course is certified. It would be the staff recommendation that it is not of benefit.

Nelson stated that the staff will analyze the material that comes in on courses.

John Bebee asked if the mid-Western Zone had a format that they preferred.

Nelson stated that the mid-Western Zone has not got to that point yet.

Mr. Clark asked who administers tests for course participants?

Furniss replied that the lecturer would in a classroom environment but with video tape or audio tape courses another testing process must be designed.

Bebee asked if they could have a two-way monitor?

Arnold replied that examinations are an issue that should be discussed. There are two different opinions presented on this issue. If examinations are needed, they should be part of the submission.

Jones suggested the council review the Pictorial guidebook and see which courses are approved for how many hours. The outline includes the goals of the class and how many credit hours are requested.

Nelson stated the council members should not worry about credit hours. The council will discuss that extensively in October and November.

Arnold stated that they should try to put the minimum amount for the maximum impact in the rules: make the rules inclusive rather than exclusive.

7. The staff would like the advisory council to review the course on changes in Montana insurance statute and administrative rules. The department would like outside review before the course is offered.

8. Certification of courses before they are offered rather than after they are offered. When an individual takes a course they know that course has been certified.

9. Pre-submission of course materials for certification, which ties to the previous issue. Arnold stated the rules should include grounds for revoking a course or an education provider, as well as, a method of recourse for providers.

10. Items for the course provider to supply the licensee, so that the licensee may receive credit for the course. The staff is proposing that as an identification number for a course provider that they use their employer identification number, the course number or course title, the number of credits or hours that student can receive, the name of the student and a course approval number. The information that the student will be providing is their name, address, license number, course name and number, credit hours completed, and testing scores.

11. Storage of records in-state or out-of-state. The records must be available for audit, and if it is noted in the rules that they must be available that should suffice.

Furniss asked if it would be possible to allow an individual to take half the course or a quarter of the course and pick up 4 hours or 8 hours. He believes that it would add considerable flexibility to the package. Nelson stated that is something that the council members are going to have to work through, but that to him an individual would have to show up for the whole thing because what part of the course would be only 4 hours. An individual needs to complete the whole course.

Bahls stated the grades agents receive should not be public record. Nelson replied that most courses do show a pass or fail.

12. An opportunity to lapse an individual license rather than receive a suspension for not meeting continuing education requirements during the first year of the continuing education program. That gives an individual a one-year grace period.

13. The identification number for insurance providers is their license number. The Child Support Act will require use of a licensee's social security number as a tracking number.

14. Credit for a specific course only once every two or every three years.

15. Licensees who live in other states without continuing education requirements must meet Montana requirements.

The next agenda item discussed was "items to discuss" on the continuing education rules (Exhibit 7). The first issue is a definition of the level of insurance sales that qualify as "incidental to other noninsurance activities." The people who believe they are included in the category of incidental are bankers and people who provide loans and offer credit insurance.

Nelson said that this is for credit life only license holders. He said a clarification needs to be made.

Clark asked if the advisory council had to define "incidental" at this meeting. Arnold said no.

The next issue was the acceptability of a maximum per year fee level for education providers. That topic was discussed by several people during their presentations. There are education providers who believe a fee of $75.00 a year per course is going to break them. There are organizations that indicated based on the fee that they will not be offering courses in the state.

Bolt asked a question on the fee issue. He feels it is ambiguous about what the Department's anticipated revenues are for the program. He wanted some additional information about what they perceive for revenue.

Nelson stated that he would have the staff provide a more detailed budget for the council members.

Dependency of educator fee levels on course credits was the next issue. Should there be a sliding fee scale.

Clark asked Jerry Furniss to comment on this item.

Bebee asked the audience to submit their suggestions on rules issues in writing to the insurance staff. The staff will forward all comments to the members.

Nelson asked that all suggestions from the audience for the council members be sent directly to Arnold.

The next topic was the acceptability of courses with non-monitored exams.

Boon stated that examinations should not be required. To attend class and then not pass is not fair. Some credit should be given even if they don't pass the exam.

Bebee stated there was no need to pass an exam in a classroom setting.

Another concern is how to monitor video tape courses.

A round table discussion on the monitoring of testing in the rural communities took place.

Mr. Davis suggested the Council discuss philosophical issues later.

The Council members agreed.

John Bebee asked if they could have audience comments before the next meeting.

Mr. Clark asked if it was important to have a quorum for all of this.

Arnold said they do need a quorum for the draft rules. Four people do need to be present.

Arnold continued on with course certification topics. The acceptability of courses other than "pure" insurance courses for

continuing education credit. Both sides of the issue have been heard.

Boon stated that she sees a difference between these. Arnold agreed and asked where the council wishes to draw the line.

Bahls stated as a public member of the group, he thinks that is a critical line to draw. He feels it would be helpful to see what other states have done.

Arnold said that other states are not in agreement on this topic. There is a lot of diversity, based on the laws passed in other states. This is a decision the Council members will have to make.

The next item is definition of what exactly constitutes a credit hour of instruction. The law says a credit hour could be a straight chronological hour or any thing else. At the present time we have no means against which to evaluate a course for credit hours.

Acceptability of package certification of several small courses offered at a conference or meeting. There are providers who want to offer several courses using one instructor in a variety of places as a package. Does this constitute one course or three. Is it acceptable to combine those into seminars that have one title, but deal with three different issues.

Allowability of audiotape, videotape, correspondence and remote site training or course offerings. This is something that is not addressed in the law directly. The law does state that we will make education available through a variety of means, and it is determining which of these is going to be allowable. The staff's hope is that all of them will be allowable.

The next topics discussed were course providers and elements of the instructor certification method. Will the members look for teaching credentials or will the insurance staff do this? What is an acceptable level of insurance experience.

The last topic was acceptability of receipt of continuing education credit by course instructors for courses they teach. If it is allowable do they receive credit for teaching the same course repeatedly and how many credits should they receive.

Arnold asked Mr. Bahls if he receives credit for the courses he teaches. Mr. Bahls stated he does get credit and gets more than one credit. He receives credit for preparation time also. A total of three credits. He receives three times the number of hours, but only once.

Everyone agreed the instructors should receive credit for teaching, but only once. A discussion was brought up by everyone on whether they should only receive it once. Mr. Clark needed to think about that issue.

McGlenn made a brief comment to the council. He believes once the members receive their written comments from the audience they will see they don't have as much a problem as it seems.

The meeting was adjourned at 5:45 p.m.

EXHIBIT 1

INSURANCE CONTINUING EDUCATION ADVISORY COUNCIL

Meeting - September 8, 1993

NAME & ADDRESS	ORGANIZATION REPRESENTED	TELEPHONE NUMBER
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Please print

Continuing Education Requirements QuickGuide

(Requirements Applicable to All Resident Agents/Brokers Licensed for Life/Health and Property/Casualty in States Below.)

EXHIBIT 2

State Dept. Phone	Continuing Education Requirement Agents & Brokers @	Compliance Deadline	Reciprocal Clause vs Course (CL) (CO)	Nonresid. Compliance	Credit Hour Carryover Allowed	Certificate of Completion Filing Requirements
Arkansas (501) 686-2840	18 hours every two years LH/PC Combined - 30 hours	Jan. 1st each two year period	CL/CO	No	Yes - only to next CE reporting period	Original certificate of completion must be sent to Dept. upon course, with a filing fee, upon completion of course
California (916) 327-3964	For licenses issued a/fter 1/1/92: 25 hours for each first 4 years from original license issue date, then 30 hours every two years thereafter. For licenses issued *before* 1/1/92: 30 hours every two years. Compliance begins with 1993 renewals. Licensees that renew in 1993 must meet 15 credit hours by the renewal date	Licensee renewal every two years	CL/CO	Yes**	Yes - can carry for credit only to next 12-month period	CE provider must report CE credit earned on behalf of agent. The agent is to keep the course certificate given by the course provider
Colorado (303) 894-7495, ext. 393	24 hours every two years Compliance begins in 1995	Licensee renewal every two years	CL/CO#	Yes**	Yes - 12 hour maximum	Agent must transfer information contained on the Certificate of Completion to Colorado's Continuing Education Summary Report Form. (This The summary form is to be submitted with the licensee renewal form and fee to the Department. The agent keeps certificate of completion on file
Delaware (302) 739-4251	Licensed for: 3-5 years - 20 hours annually 5 years + - 10 hours annually	Feb 28th yearly	CL/CO	Yes**	Yes - only to next CE reporting period	Agent must submit a copy of the *CE Course Report Form* to Department's CE monitoring program by the compliance deadline. Agent keeps original certificates on file
Florida (904) 922-3134	28 hours every 2 years (two hours must be on Florida Rules & Regulations)	End of birth month every two years.	CL/CO#	Yes**	Yes - only credit hours earned in the second half of a CE period may be carried over to the next CE period.	CE Provider must report CE credit earned by agent to Department. Agent keeps course certificate given by the course provider
Georgia (404) 656-2104	If licensed less than 20 years—15 hours annually. If licensed 20 years or more—10 hours annually	Licensee number with last 2 digits of 00-24: Sept. 1 ea. yr 25-49: Oct. 1 ea. yr 50-74: Nov. 1 ea. yr 75-99: Dec 1 ea. yr	CL/CO#	No	Yes - limited to the lesser of: a) 1/2 of the general year's requirement, or b) credit hours earned in excess of hours required for previous year's requirement.	Agent mails copy of certificate with form GID-101, Georgia's CE reporting form to the insurance department by the compliance deadline.
Idaho (208) 334-2250	40 hours every two years.	Licensee renewal every two years.	CL/CO	No	None	Course provider must report CE credits earned by the agent to the insurance department. Agent must transfer information on certificates of completion to ins. dept.'s *Insurance Continuing Education Statement* found on reverse side of renewal. Agent is to keep original certificate of completion on file
Illinois (217) 782-1019	24 hours annually for first four license renewals.	Licensee renewal annually	CL/CO	No	Yes - 25 hours maximum.	Agent must submit the original Illinois CE certificate to the insurance department at license renewal
Indiana (317) 232-2389	30 hours every two years.	Licensee renewal every two years.	CL/CO#	Yes**	None	Course provider must report credits to CE program monitor after completion of course. Agent must keep original certificates on file. There is a separate CE filing fee required to be paid by the agent.
Iowa (515) 281-4383	10 hours annually LH/PC Combined - 20 hours annually	December 31st yearly	CL/CO	Yes**	Yes - 10 hours maximum.	Agent must send photocopies of certificates of completion by the compliance deadline directly to the Dept. with a filing fee.
Kansas (913) 296-7869	12 hours every two years. LH/PC Combined - 24 hours annually	March 21st odd-numbered years.	CL/CO#	Yes**	None	Agent must transfer course information found on certificate to the Kansas summary form, *Insurance Continuing Education Summary Report* form. Copies of certificates must be attached to this summary form. When the total CE requirement has been met, submit information to Department.
Kentucky (502) 564-3630	24 hours every biennium	June 30th every even-numbered year	CL/CO*	No	Yes - 12 hours maximum.	The CE provider must send two copies of certificates to agent for signature. One copy is to be kept by agent and one signed certificate is returned to course provider. It is the course provider's responsibility to file certificate to insurance department.
Louisiana (504) 342-0895	L/H: 18 hours every two years (compliance begins with 1994 renewals). P/C: 24 hours every two years (compliance begins with 1993 renewals). LH/PC Combined - 32 hours every two years.	At license renewal, every two years.	CL/CO*	Yes**	Yes - 16 hours maximum.	Agent transfers information on certificate to Louisiana's *Continuing Education Statement*, Appendix B. Copies of the certificates must be attached to this form. This information must be submitted to the ins. dept. at license renewal.
Maine (207) 582-8707	30 hours every even-numbered year	April 1st every even-numbered year for agents. January 1st every even-numbered year for brokers.	CL/CO	No	None	It is the provider's responsibility to notify Department of agents' CE credit hours earned. The agent is to keep certificates on file.
Maryland (410) 333-4059	16 hours every odd-numbered year.	June 30th every odd-numbered year	CL/CO*	Yes**	None	Agent must submit copy of CE certificate with the license renewal.
Massachusetts (617) 727-7189, ext. 504	60 hours first 36 months 45 hours each 36 months thereafter	Every 36 months by June 30th for agents. Every 36 months from license issue date for brokers.	CL/CO	Yes**	Yes	Agent must send original certificates of completion to the insurance company by compliance deadline. Insurance company documents CE compliance. No insurance department at license renewal. Broker sends original certificates to insurance department directly.
Michigan (517) 335-2071	30 hours every two years. Compliance begins in 1995.	Compliance dates based on last digit of Soc. Sec. Number and the first letter of agent's last name every two years.	CL/CO	Yes**	None	Course provider must report CE credits to the CE monitoring program. The agent keeps original certificates of completions.
Minnesota (612) 296-6319	15 hours yearly	Oct. 31st yearly	CL/CO* - (CO-Nonres. only exempt for border states).	Yes**	None	Agent must transfer information contained on certificates to Minnesota's *Continuing Education Summary Report* form. Copies of the certificates must be submitted with these forms. Forms must be submitted to Dept. with the renewal notice.
Mississippi (601) 359-3582	L/H: 25 hours first 4 years P/C: 12 hours annually	L/H-Due January 31st annually for first 4 years P/C-At renewal	CL/CO# - (Nonres. exempt for P/C credit only).	Yes**	None	Agent must transfer information contained on certificate to Mississippi's license renewal form. Certificates of completion are not submitted for life/health renewals. Original certificates are required with P/C license renewals.
Missouri (314) 751-3518	10 hours every two years. LH/PC Combined - 16 hours every two years	Licensee renewal every two years	CL/CO	Yes*	Yes - only to next CE reporting period.	Agent must transfer information contained on certificate to Missouri's *Continuing Education Certification Summary* form. The summary form is to be submitted with the license renewal form and fee to the Department. The agent keeps certificates on file.
(1) Nebraska (402) 471-2201 (2) Nebraska (402) 471-2201	Various course options approved by the insurance department. L/H: 12 hours every two years P/C: 24 hours every two years	Within first 8 years of original license issue date. 45 days prior to license renewal every two years	CL/CO CL/CO	Yes (L/H only) No	None None	Agent sends original certificates of completion to insurance department when the full 2-year CE requirement has been met. Certificates for the 8-year minimum education requirement may be submitted as completed.
Nevada (702) 687-4270	30 hours every three years	Licensee renewal every three years	CL/CO#	No	None	Agent must submit original CE certificates of completion with license renewal.
New Hampshire (603) 225-3374	30 hours every two years	Due 60 days prior to license renewal every two years (license renewal is June 14th every two years for agents).	CL/CO	No	None	Agent must transfer information from the certificate of completion to New Hampshire's *Continuing Education Summary Report* form, and submit form to the insurance department 60 days prior to renewal.

@ If "L/H/PC Combined" is not shown in the state requirement, the CE requirement is the same regardless of the number of licenses held.

Monitored exam required for correspondence study.

* Restrictions exist on how much of requirement may be met via correspondence study. Check with state insurance department for details.

**Nonresidents may be exempt from CE requirement dependent upon whether the agent meets a similar home state requirement and/or there is a reciprocal agreement between the states.

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Continuing Education Requirements QuickGuide

(Requirements Applicable to All Resident Agents/Brokers Licensed for Life/Health and Property/Casualty in States Below.)

1993.2

State Dept. Phone	Continuing Education Requirement Agents & Brokers●	Compliance Deadline	Study Methods Class vs Corres. (CL) (CO)	Nonres. Compliance	Credit Hour Carryover Allowed	Certificate of Completion Filing Requirements
New Jersey (609) 292-4419	48 units every 4 years. Compliance begins May 1, 1995	90 days prior to license renewal every 4 years	CL	No	None	Course provider must report CE credits to the CE monitoring program. The agent keeps original certificates of completion
New Mexico (505) 827-4662	15 hours annually (including 1 hour of ethics)	Sept. 30th yearly	CL/CO	Yes**	None	Agent must send original certificates to insurance department when the full requirement is met with a filing fee.
North Carolina (919) 733-1643	12 hours annually. LH/PC Combined - 18 hours annually. (Residents required to take a course on NC Statute and Rules every even-numbered year as a part of the CE requirement.)	To continue license, CE must be completed and reported by Dec. 31st yearly	CL/CO#	Yes **	Yes - maximum of 9 hours for single license. Dual license is limited to 6 hours for any one license.	Course provider must report CE credits to Department. The agent keeps original certificates of completion
North Dakota (701) 224-2440	15 hours annually	Due by Jan. 31st for last names of A-K every odd-numbered year; L-Z every even-numbered year	CL/CO*	Yes**	Yes - 18 hours maximum	Agent must transfer information on certificate to North Dakota's *Continuing Education Summary Report of Compliance* and submit the form at CE compliance time along with a filing fee. Agent keeps original certificates of completion on file. Provider must also report proof of compliance.
Oklahoma (405) 521-2828	6 hours annually (including 1 hour of ethics)	At license renewal annually	CL/CO	Yes**	Yes - only to the next CE reporting period. Ethics requirement must be repeated each year.	Course provider must report CE credits earned on behalf of agent. Agent is to file copies of certificates of completion at license renewal.
Oregon (503) 378-4511	Licensed for: 1-5 years - 48 hours every two years. 6 years + - 24 hours every two years.	24 hours required with first license renewal. Then every two years thereafter at license renewal	CL/CO	No	None	Agent must transfer certificate information on to license renewal form provided by Department. Agent keeps original certificates of completion.
Puerto Rico (809) 722-8686	Years 0-9- 18 hours yearly. Years 10-19- 12 hours yearly. Years 20-24- 6 hours yearly. Years 25+ - exempt.	June 30th yearly.	CL/CO	No	Yes - to next reporting period.	Agent is to certify at license renewal that the CE requirement has been satisfied. The agent is to maintain the original certificates on file.
Rhode Island (401) 277-2223	45 hours every 3 years (15 hours per year).	License renewal every 3 years.	CL/CO	Yes**	Yes - only to the next CE reporting period.	Agent is to transfer information from the certificate to Rhode Island's *Insurance Continuing Education Course Report* form. Agent keeps the original certificates of completion. No submission of any forms required until requested by the Department.
South Carolina (803) 737-6160	24 hours every two years. Compliance begins in 1994	Due 120 days prior to license renewal date.	CL/CO	Yes**	Yes - only to the next CE reporting period.	Course provider reports CE credits to South Carolina's CE monitoring program on behalf of agent. The CE monitor submits certificate of completion to the sponsoring insurance company. The insurance company provides proof of completion to the Department at time of license renewal.
South Dakota (605) 773-3563	10 hours every two years. LH/PC Combined - 20 hours every two years.	April 1st, even years.	CL/CO	No	None	Agent must transfer information from certificate on to state's *Continuing Education Verification* form and attach copies of certificates of completion. All forms must be submitted to insurance department by the license renewal date.
Tennessee (615) 741-2693	25 hours annually for 1st four years of license.	License renewal annually	CL/CO	No	None	Agent must send copy of certificate of completion to insurance department at time of license renewal.
Texas (512) 322-4190	30 hours every two years. (Note: Requirement to change to 15 hours biennially beginning with 1994 renewals.)	License renewal every two years.	CL/CO	Yes** (L/H and Adj. only)	None	Agent transfers information from certificate of completion to the state's *Continuing Education Summary Report*. A copy of the certificate needs to accompany the summary form and mailed with license renewal.
Utah (801) 328-4556	12 hours every two years.	Due March 31st every even-numbered year with license renewal.	CL/CO*	Yes**	None	Course provider must report continuing education credit to the insurance department. Agent must file certificate of completion with filing fee at Department by compliance deadline.
Virginia (804) 786-2631	18 hours every two years. LH/PC combined - 24 hours every two years. (Two hours must be on Virginia law). Compliance begins 1994.	Due 12/31 every even-numbered year.	CL/CO	Yes**	Yes - only to next reporting period.	Not yet determined.
Washington (206) 753-3492	12 hours annually.	Each license renewal annually (date of birth).	CL/CO	No	Yes - excess credits can be carried over for up to 24 months from course completion date.	Agent must transfer information on certificate to Washington's license renewal application form each year. Agent must attach copy of certificate to renewal application.
West Virginia (304) 558-0610	24 hours every two years. Compliance begins in 1994.	Due June 30th every even-numbered year.	CL/CO#	No	None	Course provider must report CE credits on behalf of the agent. Agent keeps certificates of completion on file.
Wyoming (307) 777-7401	If initially licensed after June 30th: 5 hours only in first year of license. All others: 10 hours annually (two hours must be on law & ethics).	Due Dec. 31st each year.	CL/CO#	Yes** - All agents must meet WY 2-hour law requirement.	Yes - 8 hours maximum.	Course provider reports CE credits to the state in addition to the agent. The agent transfers information from the certificate onto the state's *Continuing Education Course Verification* form. Copies of the certificates along with a filing fee is attached to the verification form and is required to be sent to the insurance dept. by the CE compliance deadline.

CE Reqoirement for Designations	Continuing Education Requirement	Compliance Deadline	CE Proof Sent By:
Chartered Life Underwriter (CLU) & Chartered Financial Consultant (ChFC) - PACE Program	60 hours every two years.	December 31st of two-year period.	Agent
Accredited Advisor In Insurance (AAI)	25 hours every three years.	End of three-year reaccreditation period	Agent
Certified Financial Planner (CFP)	(1) 30 hours every two years - post-certification (2) 15 hours annual requirement - pre-certification	(1) December 31st of two-year period to be reported. (2) Upon completion of the certification requirements	Agent

● If "LH/PC Combined" is not shown in the state requirement, the CE requirement is the same regardless of the number of licenses held.

Monitored exam required for correspondence study

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This Useful QuickGuide is brought to you courtesy of Pictorial, Inc., 8081 Zionsville Road, Indianapolis, IN 46268. Information contained on this QuickGuide is subject to change as insurance departments' rules and procedures change.

UPCOMING CONTINUING EDUCATION STATES

DISTRICT OF COLUMBIA MONTANA NEW YORK OHIO PENNSYLVANIA

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EXHIBIT 3

MONTANA CONTINUING EDUCATION PROGRAM

State Auditor's Office - Insurance Department
P. O. Box 4009
Helena, Montana 59604-4009
406-444-2040

Business name_____

Business address_____

City_____**State**___**Zip Code**_____

Continuing Education Contact_____

Number of courses you expect to offer in Montana _____

Type of courses on-site correspondence both

Course subjects (circle all that apply)

Annuities	Casualty	Credit Life and Disability
Disability	Health	Life
Long Term Care	Medicare Supplement	Property
Surety	Title	Variable Products

Other _____

Are your courses certified in other states? Yes No

Which states?_____

_____

Please enclose a stamped, self-addressed, 9 X 12 envelope to receive course certification materials.

If your form is not returned your name will be removed from our mailing list.

EXHIBIT 4

INSURANCE CONTINUING EDUCATION ADMINISTRATIVE RULE TIME TABLE

August 1993

Develop draft administrative rules - staff

September 1993

8 - Discuss/revise draft administrative rule issues - Advisory Council

Incorporate Advisory Council direction into draft administrative rules - staff

October 1993

6 - Send draft rules to Advisory Council members - staff
15 - Discuss/revise draft administrative rules - Advisory Council

Finalize draft administrative rules - staff

18 - File public notice of rules hearing - Secretary of State
28 - Publication of proposed rules notice - Secretary of State
28 - Mailing of proposed rules to interested parties - staff

November 1993

1 - Announce public hearing - Auditor's staff (press release)
29 - Public hearing on proposed rules - Advisory Council members attend
30 - Close of public comment period

December 1993

Prepare responses to public comments - staff

13 - File public notice of adoption - Secretary of State
23 - Publish notice of adoption - Secretary of State
24 - Rules final and effective
27 - Print interim rule copies for distribution - staff

March 1994

Distribute final rules to staff, advisory council members and requesting entities (agents, companies, agencies, other states, etc.)

September 7, 1993

EXHIBIT 5

INSURANCE CONTINUING EDUCATION ADVISORY COUNCIL

Proposed 1993 Meeting Schedule

The following dates are open on all advisory council member schedules:

Wednesday, September 8*

Monday, October 4
Wednesday, October 6*
Friday, October 15*
Wednesday, October 20

Wednesday, November 3*
Wednesday, November 17*
Monday, November 22
Monday, November 29***

Friday, December 3
Monday, December 6
Friday, December 10*
Wednesday, December 15*
Friday, December 17

* - recommended or alternate meeting dates
*** - required Public Hearing on proposed Administrative Rules

Updated September 7, 1993

INSURANCE CONTINUING EDUCATION ADVISORY COUNCIL

Work Plan

September 1993

SCHEDULED ACTIVITIES

8th Initial meeting of the Insurance Continuing Education Advisory Council -- 1:00 pm, Dept. of Natural Resources and Conservation, Director's Conference Room, 1520 East 6th Avenue, Helena

GOALS

* Review materials on Senate Bill 354, continuing education nationwide, insurance producers and consultants in Montana
* Adopt Advisory Council work plan
* Set meeting dates through December 1993
* Discuss administrative rule process
* Discuss administrative rule issues

October 1993

SCHEDULED ACTIVITIES

6th Advisory Council meeting -- Discuss proposed administrative rules on course certification standards, instructor certification standards, fees and projected program budget

15th Possible Advisory Council meeting -- to deal with any items remaining October 6

18th Give public notice of rules through Secretary of State

GOALS

* Review and revise draft administrative rules for submission
* Review format for educator submission of course completion data
* Submit draft administrative rules to Secretary of State to begin formal rule making process

November 1993

SCHEDULED ACTIVITIES

3rd Advisory Council meeting -- Certify other state programs, discuss form for insurance provider submission, review industry association sponsored courses

29th Public hearing on proposed administrative rules for insurance continuing education program -- afternoon

GOALS

* Review course materials from course providers for certification
* Review form for written certification by licensees
* Attend/participate in public hearing on Administrative Rules

December 1993

SCHEDULED ACTIVITIES

10th Advisory Council meeting -- Certify courses

24th Rules final

GOALS

* Review draft list of course providers and courses
* Notify (send letter):
  - Course providers of certification
  - Licensees of continuing education requirements and fees and certified course providers

January 1994

SCHEDULED ACTIVITIES

* Hire administrative assistant/licensing position

GOALS

* Review list of consumer complaints to identify material to include in changes in insurance statutes and administrative rules course
* Evaluate and certify additional courses.

February 1994

SCHEDULED ACTIVITIES
Advisory Council meeting --

GOALS
* Develop course on changes in Montana insurance statutes and administrative rules

March 1994

SCHEDULED ACTIVITIES

GOALS
* Offer in-house dry run of 1 hour changes in Montana insurance statutes and administrative rules course. Make appropriate revisions.

April 1994

SCHEDULED ACTIVITIES
Advisory Council meeting -- certify additional courses

GOALS
* Review information to evaluate fee levels based on program costs to date.

May 1994

SCHEDULED ACTIVITIES

GOALS
* Prepare and print changes in Montana insurance statutes and administrative rules course book.

June 1994

SCHEDULED ACTIVITIES
Advisory Council meeting --

GOALS
* Provide changes in Montana insurance statutes and administrative rules course to out-of-state licensees.

EXHIBIT 7

CONTINUING EDUCATION RULES
- ITEMS TO DISCUSS -

General

Define level of insurance sales that qualify as "incidental to other non-insurance activities".

Fees

Acceptability of a maximum, per year fee level for education providers.

Dependency of educator fee levels on course credits.

Course Certification

Acceptability of courses with non-monitored exams.

Acceptability of courses other than "pure" insurance courses for continuing education credit.

Definition of what exactly constitutes an hour (or credit) of instruction.

Acceptability of package certification of several small courses offered at a conference or meeting.

Allowability of audiotape, videotape, correspondence and remote site training or course offerings.

Course Providers

Elements of the instructor certification method.

Elements of the student complaint process.

Elements of the appeal process for providers.

Licensee

Acceptability of receipt of continuing education credit by course instructors for courses they teach.